

**REMARKS/ARGUMENT**

Claims 1-16 are pending after entry of this proposed Amendment. Claims 1, 10, and 14 are herein proposed to be amended as fully described below in reference to the grounds for final rejection. Support for the proposed claim amendments is in the specification as filed at page 4, lines 2-7. No new matter is introduced, and no additional limitation is proposed requiring further search. Applicants respectfully submit entry of the proposed claim amendments is proper and warranted after final as placing the application in condition for allowance by clarifying that which is currently claimed.

**Rejections under 35 USC §102**

Claims 1-7 and 10-16 were rejected under 35 USC §102(e) as anticipated by IBMLdap (IBM LDAP Implementation Cookbook, Johner et al., June 1999, IBM, hereinafter "IBMLdap"). The rejections are traversed, and Applicants request reconsideration in light of proposed claim amendment.

In finally rejecting claims 1-7 and 10-16, the Office maintains the assertion that the reference discloses the features of claims 1, 10, and 14 at page 32, and pages 163-165 of the IBMLdap reference. In the Response to Applicants' Arguments, it is apparent that the Office has interpreted Applicants' use of the term "template" as exclusively reciting a structure as in an object or composition, the thing constructed, as in an entry instantiated from an object class. Applicants, however, are claiming a template for an organizational structure. As stated in the first paragraph of the Detailed Description of the Invention at page 4, lines 2-7, "These templates specify the relationships among the various types of information in directories." The reference does not teach or suggest such a template.

As Applicants have previously argued, the reference, and specifically the cited sections, disclose that which Applicants describe that the prior art discloses in Applicants' specification as filed at pages 1-2. Specifically, Applicants describe that the "LDAP directory service model is based on entries. Each entry in LDAP comprises a collection of attributes. In turn, each attribute consists of a type and one or more values. The type of an attribute identifies the format of the data contained in the values of that attribute" (page 1, lines 25-28). Further, "Entries in an LDAP directory service are organized in a tree structure. Under the protocol, data may be stored in any arbitrary fashion, as long as a tree structure is maintained" (page 2, lines 1-2). The reference teaches the objects, the entries, but does not teach or suggest an organizational structure, a template specifying the relationships among the various types of information in directories.

Applicants further point to the specification as filed describing in detail that the claimed template is an organizational structure and scheme, specifying and defining relationships among and between objects or directory entries. See for example, page 5, lines 1-9 discussing exemplary XML code defining the structure templates. Each exemplary entry corresponds to a node that will be created in the directory tree, the nodes defining relationships or an organizational structure. In the succeeding paragraphs, various attributes are defined, further specifying the relationships among the entries, and at page 6, lines 25-30, the resolution of ambiguity is addressed in situations when differentiation of attributes is blurred, further clarifying the relationships specified.

Applicants further point out that the claim feature, for a given one of said object types, said corresponding definition identifies zero or more others of said object types to be **automatically created and added** to the directory whenever said given object type is added to the directory, is simply not taught by the reference. At pages 163-165, the reference describes a process for defining a new object class. Attributes of a parent object class can be inherited (see page 165) by the new object class. However, this does not teach that the identifying zero or more others of said object **type** to be **automatically created and added** to the directory. Nothing in the reference discloses automatically creating and adding one or more others of said object type to a directory. Nothing in the process illustrated and described at pages 163-165 appears to be automatic at all.

In order for a reference to anticipate a claim, each and every element as set forth in the claim must be found in the reference, either expressly or inherently described. MPEP 2131. Applicant respectfully submits that the IBMLdap reference does not anticipate Applicant's independent claims 1, 10, or 14, as proposed to be amended herein.

For at least the above reasons, the IBMLdap reference fails to disclose each and every element as set forth in Applicants' independent claims 1, 10, or 14, as proposed to be amended herein. The reference therefore fails to anticipate Applicants' independent claims 1, 10, or 14. Each of dependent claims 2-7, 11-13, and 15-16 depend, directly or indirectly from one of independent claims 1, 10 and 14, and the reference therefore fails to anticipate Applicants' dependent claims for at least the same reasons that it fails to anticipate the independent claims. Applicants therefore respectfully request reconsideration, and request that these rejections be withdrawn.


**Rejections under 35 USC §103**

Claims 8-9 were rejected under 35 USC §103(a) as being unpatentable over IBMLdap as applied to claims 1-7 and 10-14, and further in view of XMLanp (XML Articles and Papers, January - March, 2000, a Google search result, 11/21/04, hereinafter "XMLanp").

For at least the reasons discussed above that IBMLdap fails to teach, or suggest, all of the features of Applicants' independent claim 1, Applicants respectfully submit that the combination of IBMLdap and XMLanp fail to teach or suggest all of the claim features of Applicants' claims 8-9, from which claims 8-9 ultimately depend. Applicants respectfully submit that claims 8-9 are patentable over IBMLdap in further view of XMLanp under 35 USC §103(a). Applicants request reconsideration and that the rejections be withdrawn.

In view of the foregoing, Applicants respectfully request reconsideration of claims 1-16. Applicants submit that entry of the proposed amendment after final is proper as placing the application in condition for allowance, and Applicants further submit that all claims are in condition for allowance. Accordingly, a notice of allowance is respectfully requested. If Examiner has any questions concerning the present Amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900, ext. 6905. If any additional fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. SUNMP506). A copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
MARTINE PENILLA & GENCARELLA, LLP

  
Rick von Wohld, Esq.  
Reg. No. 48,018

710 Lakeway Drive, Suite 200  
Sunnyvale, California 94085  
**Customer Number 32291**